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January 29, 2021

Docket Control
Commissioner Sandra D. Kennedy
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

Re: Response of Arizona Public Service Company (APS or Company)
Application for Approval of Rates, Charges and Schedules
Docket No. E-01345A-19-0236

Commissioner Kennedy:

On January 21, 2021, APS provided information regarding political spending and lobbying expenses for 2019 and the first quarter of 2020 for APS and its parent company, Pinnacle West Capital Corporation (Pinnacle West) in response to your request during hearings in the above docket.

This letter supplements the Company's original response and provides political spending and lobbying expenses for the remainder of 2020.

Political Participation Expense

Pinnacle West's political spending details are included in Attachment A to this letter. Total spending in this area by Pinnacle West for the period April 1, 2020 through December 31, 2020 was \$551,770.

As noted in the Company's prior response, these expenses include contributions to political parties, payment to trade associations that may have been used for lobbying-related or other political activities as reported to Pinnacle West, and independent political expenditures directly or in support of an independent political action committee. Political participation expenses are not included in APS customer rates and APS does not make political contributions.

Lobbying Expense

Lobbying expenses for Pinnacle West are included in the political spending totals provided above.

Details of APS's outside lobbying expenses are provided in Attachment B to this letter. Although our customers benefit from this activity, APS does not include lobbying expenses in customer rates. Total APS spending in this area was \$327,338 for April 2020 through December 2020.

Please let me know if you have any questions.

Sincerely,

/s/ Rod Ross

Rodney J. Ross

RJR/bgs
Attachments

ATTACHMENT A

**PINNACLE WEST CAPITAL CORPORATION
POLITICAL PARTICIPATION DETAILS
APRIL 2020 THROUGH DECEMBER 2020**

Amount	Year	Month	Vendor Name	Purpose
\$50,000.00	2020	202004	ARIZONANS FOR STRONG LEADERSHIP	CONTRIBUTION
\$36,421.25	2020	202004	EDISON ELECTRIC INSTITUTE	Annual Dues (expensed quarterly) ¹
\$15,000.00	2020	202004	EDISON FOUNDATION	CONTRIBUTION
\$5,000.00	2020	202004	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$5,000.00	2020	202004	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$1,477.35	2020	202004	NUCLEAR ENERGY INSTITUTE	Annual Dues (expensed quarterly) ¹
\$15,000.00	2020	202004	REPUBLICAN ATTORNEYS GENERAL ASSOCIATION	CONTRIBUTION
\$50,000.00	2020	202004	REPUBLICAN GOVERNORS ASSOCIATION	Membership Fees
\$50,000.00	2020	202004	REPUBLICAN LEGISLATIVE VICTORY FUND	CONTRIBUTION
\$50,000.00	2020	202006	ARIZONA INTEGRITY PAC	CONTRIBUTION
\$5,000.00	2020	202006	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$5,000.00	2020	202006	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$36,421.25	2020	202007	EDISON ELECTRIC INSTITUTE	Annual Dues (expensed quarterly) ¹
\$7,500.00	2020	202007	EDISON FOUNDATION	CONTRIBUTION
\$2,010.30	2020	202007	NUCLEAR ENERGY INSTITUTE	Annual Dues (expensed quarterly) ¹
\$50,000.00	2020	202007	SENATE LEADERSHIP FUND	CONTRIBUTION
\$1,152.50	2020	202008	ARIZONA TAX RESEARCH ASSOCIATION	Annual Dues (expensed quarterly) ¹
\$15,000.00	2020	202008	LEADING FOR CHANGE	Sponsorship
\$25,000.00	2020	202008	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$50,000.00	2020	202009	DEMOCRATIC LEGISLATIVE CAMPAIGN COMMITTEE	CONTRIBUTION
\$5,000.00	2020	202009	MARICOPA COUNTY DEMOCRATIC PARTY	CONTRIBUTION
\$36,421.25	2020	202010	EDISON ELECTRIC INSTITUTE	Annual Dues (expensed quarterly) ¹
\$7,500.00	2020	202010	EDISON FOUNDATION	CONTRIBUTION
\$2,010.30	2020	202010	NUCLEAR ENERGY INSTITUTE	Annual Dues (expensed quarterly) ¹
\$10,000.00	2020	202010	YES FOR VALLEYWISE	CONTRIBUTION
\$1,053.54	2020	202011	AMERICAN LEGISLATIVE EXCHANGE COUNCIL	Virtual Meeting/Expense Reimbursement
\$12,000.00	2020	202011	AMERICAN LEGISLATIVE EXCHANGE COUNCIL	Membership Fees
\$1,152.50	2020	202011	ARIZONA TAX RESEARCH ASSOCIATION	Annual Dues (expensed quarterly) ¹
\$1,650.00	2020	202012	ARIZONA TAX RESEARCH ASSOCIATION	Annual Membership Dues ¹

¹Expenses for trade associations reflect only that portion of dues/payments that may have been used for lobbying or other related political activities as reported by the associations. Please see paragraph 5.2 of the Pinnacle West Political Participation Policy.

ATTACHMENT B

**PINNACLE WEST CAPITAL CORPORATION
POLITICAL PARTICIPATION DETAILS
APRIL 2020 THROUGH DECEMBER 2020**

Amount¹	Year	Month	Vendor Name²	Purpose
\$7,500.00	2020	202004	CLARUS COMPANIES LLC	APRIL 2020 RETAINER
\$7,500.00	2020	202004	GULLETT COMPANY	FEBRUARY 2020 RETAINER
\$5,000.00	2020	202004	THE WEAKS LAW FIRM PC	MAY 2020 RETAINER
\$10,000.00	2020	202004	WILLETТА PARTNERS INC	APRIL 2020 RETAINER
\$7,500.00	2020	202005	CLARUS COMPANIES LLC	MAY 2020 RETAINER
\$7,500.00	2020	202005	GULLETT COMPANY	MARCH 2020 RETAINER
\$10,000.00	2020	202005	WILLETТА PARTNERS INC	MAY 2020 RETAINER
\$7,500.00	2020	202006	CLARUS COMPANIES LLC	JUNE 2020 RETAINER
\$7,500.00	2020	202006	GULLETT COMPANY	APRIL 2020 RETAINER
\$5,000.00	2020	202006	THE WEAKS LAW FIRM PC	JUNE 2020 RETAINER
\$7,500.00	2020	202007	CLARUS COMPANIES LLC	JULY 2020 RETAINER
\$10,000.00	2020	202007	WILLETТА PARTNERS INC	JUNE 2020 RETAINER
\$7,500.00	2020	202008	CLARUS COMPANIES LLC	AUGUST 2020 RETAINER
\$5,000.00	2020	202008	THE WEAKS LAW FIRM PC	JULY 2020 RETAINER
\$5,000.00	2020	202009	CHRISTIAN GOODMAN PLC	SEPTEMBER 2020 RETAINER
\$7,500.00	2020	202009	CLARUS COMPANIES LLC	SEPTEMBER 2020 RETAINER
\$7,500.00	2020	202009	GULLETT COMPANY	MAY 2020 RETAINER
\$7,500.00	2020	202009	GULLETT COMPANY	JUNE 2020 RETAINER
\$7,500.00	2020	202009	GULLETT COMPANY	JULY 2020 RETAINER
\$10,000.00	2020	202009	POLICY DEVELOPMENT GROUP INC	AUGUST 2020 RETAINER
\$4,838.00	2020	202009	POLICY DEVELOPMENT GROUP INC	JULY 2020 Expense Reimbursement
\$10,000.00	2020	202009	POLICY DEVELOPMENT GROUP INC	SEPTEMBER 2020 RETAINER
\$5,000.00	2020	202009	THE WEAKS LAW FIRM PC	AUGUST 2020 RETAINER
\$5,000.00	2020	202009	THE WEAKS LAW FIRM PC	SEPTEMBER 2020 RETAINER
\$10,000.00	2020	202009	WILLETТА PARTNERS INC	AUGUST 2020 RETAINER
\$10,000.00	2020	202009	WILLETТА PARTNERS INC	JULY 2020 RETAINER
\$10,000.00	2020	202009	WILLETТА PARTNERS INC	SEPTEMBER 2020 RETAINER
\$5,000.00	2020	202010	CHRISTIAN GOODMAN PLC	OCTOBER 2020 RETAINER
\$7,500.00	2020	202010	CLARUS COMPANIES LLC	OCTOBER 2020 RETAINER
\$7,500.00	2020	202010	GULLETT COMPANY	AUGUST 2020 RETAINER
\$10,000.00	2020	202010	WILLETТА PARTNERS INC	OCTOBER 2020 RETAINER
\$5,000.00	2020	202011	CHRISTIAN GOODMAN PLC	NOVEMBER 2020 RETAINER
\$7,500.00	2020	202011	CLARUS COMPANIES LLC	NOVEMBER 2020 RETAINER
\$7,500.00	2020	202011	GULLETT COMPANY	SEPTEMBER 2020 RETAINER
\$5,000.00	2020	202011	THE WEAKS LAW FIRM PC	NOVEMBER 2020 RETAINER
\$5,000.00	2020	202011	THE WEAKS LAW FIRM PC	OCTOBER 2020 RETAINER
\$10,000.00	2020	202011	WILLETТА PARTNERS INC	NOVEMBER 2020 RETAINER
\$5,000.00	2020	202012	CHRISTIAN GOODMAN PLC	DECEMBER 2020 RETAINER
\$7,500.00	2020	202012	GULLETT COMPANY	OCTOBER 2020 RETAINER
\$10,000.00	2020	202012	POLICY DEVELOPMENT GROUP INC	DECEMBER 2020 RETAINER
\$10,000.00	2020	202012	POLICY DEVELOPMENT GROUP INC	NOVEMBER 2020 RETAINER
\$10,000.00	2020	202012	POLICY DEVELOPMENT GROUP INC	OCTOBER 2020 RETAINER
\$10,000.00	2020	202012	WILLETТА PARTNERS INC	DECEMBER 2020 RETAINER

¹Amounts listed may include funds paid for non-lobbying activities.

²The entities listed were registered as lobbyists for APS/Pinnacle West at some time during the relevant period.